## Exhibit 10.

Informational Elements of Dixie Pipeline - Integrity Management Program 305, 306

<u>Contents</u> (select elements of the document, commencing on the following page)

- 1. "Segment Identification" [of "High Consequence Areas" (HCAs)]
- 2. "Procedure for Identifying HCAS and HCA Segments"
- 3. "HCA Detail Assessment" [for the segment of pipeline located in Clarke County]

## Notes

 due to the lengthy volume content of this document, only select segments of this document (directly relative to the HCA aspect of the Investigation, as prescribed specifically within Clarke County) are included in this report.

- the HCA Detail Assessment tabulation:
  - contains all of the data transmittal (as received in a Microsoft Excel Worksheet® file), although the tabulation has been reformatted slightly to fit on the designated page.
  - essentially provides the 'delineated engineering station [distance measurement] data' for the specific segment of Dixie pipeline that commences a short distance west of the western boundary of Clarke County (which occurs at engineering station 22162+22), and proceeds in an eastward direction, to conclude a short distance beyond the Clarke County [Mississippi] / Choctaw County [Alabama] boundary (which occurs at engineering station 22813+10).
- the transmittal of the HCA Detail Assessment [from the Manager of the Pipeline Integrity Group] indicated "There are no HCAs from engineering station 22226+72 (upstream of Carmichael Station) to the Clarke County / Choctaw County boundary (engineering station 22813+10)."

305 documentation (as applicable for the time period of the accident) as filed with the PHMSA

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<sup>&</sup>lt;sup>306</sup> source: data as received (via emails, dated 5/23/2008 and 5/28/2008) from the Manager of the Pipeline Integrity Group (via the Dixie / Enterprise Products - Party to the Investigation representative).

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This process addresses the identification of pipeline segments that could affect High Consequence Areas (HCAs).

## 1.01 HCA Identification

DIXIE shall use data from the National Pipeline Mapping System (NPMS) as well as other informational sources to identify segments that could affect HCAs per "Procedure for Identifying HCAs and HCA Segments".

In addition to NPMS data, information obtained from routine field activities (e.g., ROW surveys, aerial surveillance), and other information sources may be used as required per "*HCA and HCA Segment Field Validation*".

When information is available from an information analysis, or from Census Bureau maps, that population density around a pipeline segment has changed so as to fall within the definition of a high population area or other populated area per 49 CFR 195.450, the newly-identified HCA will be incorporated into the baseline assessment plan within one year from the date identified.

#### 1.02 Direct Intersections

All locations of the pipeline system, including facilities, located within a HCA will be identified per "*Procedure for Identifying HCAs and HCA Segments*".

#### 1.03 Direct Intersection Exceptions

HVL pipelines (excluding Y-grade and NH3) are considered to not affect drinking water USAs. Due to the nature of HVLs (vapor pressure greater than 40 psia), they will not remain in a liquid form when released but will volatize into the air.

## 1.04 Release Locations Selected for Analysis

The release locations selected for analysis will be determined per "Procedure for Identifying HCAs and HCA Segments".

## 1.05 Spill Volume

Potential volume releases will be determined per "Procedure for Identifying HCAs and HCA Segments".

## SEGMENT IDENTIFICATION SECTION 1

#### 1.06 Overland Spread of Liquid Pool

Overland spread analysis will be per "Procedure for Identifying HCAs and HCA Segments".

## 1.07 Water Transport Analysis

Water transport analysis will be per "Procedure for Identifying HCAs and HCA Segments".

## 1.08 Air Dispersion Analysis

Air dispersion analysis will be per "Procedure for Identifying HCAs and HCA Segments".

## 1.09 Identification of Segments that Could Affect HCAs

All locations of the pipeline system, including facilities that could affect HCAs will be identified per "*Procedure for Identifying HCAs and HCA Segments*".

## 1.10 Revision Control

Revisions to the identified HCA segments and processes and procedures for analysis to determine what pipeline segments could affect HCAs will be completed per the DIXIE Integrity Management Program "IMP Change Management" process.

Revisions to identified HCA segments will be incorporated into the Baseline Assessment Plan within one year from the date changes are identified. The baseline assessment of any line pipe that could affect a newly identified HCA will be completed within five years from the date the area is identified.

## 1.11 Process Formality

Idle lines that contain hazardous liquids are included in the segment identification process. Segment identification is not conducted on idle lines that are filled with nitrogen.

Quality assurance of the segment identification process will be per "Procedure for Segment Identification Validation".

## 1.12 Initial Dixie Pipeline Segment Identification

The initial segment identification was completed utilizing the "Dixie Pipeline Company IMP rev. 0 Section 4.0".

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#### 1. PURPOSE

The purpose of this procedure is to standardize steps required to perform segment identification, including identification of high consequence areas and where DIXIE Pipeline Company operated liquids pipelines and facilities could affect a high consequence area.

## 2. LOCATING AREAS OF HIGH CONSEQUENCE

- 2.1. DIXIE shall download data from the National Pipeline Mapping System (NPMS), which has compiled a series of GIS shape files showing the extents of the high consequence areas (HCAs).
- 2.2. DIXIE identifies areas of pipeline that could affect an HCA as follows:
  - 2.2.1. Pipelines containing Non-HVL hazardous liquids
    - 2.2.1.1. Areas where assets fall directly within HCAs
    - 2.2.1.2. Areas where assets are within a 500 foot buffer around an HCA (indirect impact)
    - 2.2.1.3. Areas where product flows downhill could reach an HCA as determined by overland spread analysis
    - 2.2.1.4. Areas where product could be transported via streams or rivers to impact HCAs
  - 2.2.2. Pipelines containing HVLs, (excluding Y-grade and NH3)
    - 2.2.2.1. Areas where assets fall directly within a commercially navigable waterway (CNW), high population area (HPA), and other populated area (OPA), or an unusually sensitive area (USA), excluding drinking water USAs.
    - 2.2.2.2. Areas where assets are within a distance defined by an aerial dispersion buffer to a CNW, HPA, OPA, or USA, excluding drinking water USAs.
    - 2.2.2.3. A propane release will have no impact on Drinking Water Supply (FAQ Number 3.25). This is based on the physical characteristics of propane. Because propane has a negligible solubility in water, it has been determined that a pipeline transporting only propane will not have an impact on any drinking water HCA.
  - 2.2.3. Pipelines containing Y-grade.
    - 2.2.3.1. Areas where assets fall directly within HCAs

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- 2.2.3.2. Areas where assets are within a distance defined by an aerial dispersion buffer to a CNW, HPA, OPA, or USA, excluding drinking water USAs.
- 2.2.4. Pipelines containing NH3.
  - 2.2.4.1. Areas where assets fall directly within HCAs
  - 2.2.4.2. Areas where assets are within a distance defined by an aerial dispersion buffer to an HCA.
  - 2.2.4.3. Areas where product could be transported via streams or rivers to impact HCAs.

#### 3. METHODOLOGY

- 3.1. DIXIE shall acquire base data for overland spread and water transport calculation. Examples of such datasets include but are not limited to the US Geologic Survey National Hydrology Dataset (NHD), which is a network of streams and rivers, and the National Elevation Dataset (NED), which is digital elevation data.
- 3.2. The pipeline analysis shall consider all products transported.
- 3.3. Direct and Indirect Impact of High Consequence Areas
  - 3.3.1. In order to determine whether the DIXIE assets fall directly within HCAs, the HCA shape files are intersected with pipeline centerlines in a GIS software package. The engineering stationing of the impacts is then captured for the pipeline segments and recorded in a database. This engineering stationing reflects equations from alignment sheets and the three-dimensional length of the pipeline as installed, rather than a shorter two-dimensional length determined by GIS alone.
  - 3.3.2. For indirect impact and aerial dispersion buffer impact, the HCA shape files are buffered, and the buffers are intersected with pipeline centerlines in a GIS software package. The engineering stationing of the impacts is then captured for the pipeline segments and recorded in a database in the same manner as 3.3.1.
  - 3.3.3. A 500-foot indirect impact buffer shall be used for Non-HVLs to take into account potential discrepancies in the level of spatial accuracy.
  - 3.3.4. Aerial dispersion shall be used to determine buffers for HVLs including Y-grade and NH3. Using the diameter of the pipe, the type of product involved, and the line's internal pressure, a buffer distance shall be calculated using industry accepted dispersion modeling such as Det Norske Veritas's PHAST, Baker Risk's Safe Site 3<sup>rd</sup> Generation and/or CANARY by Quest. The buffer distance is then

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rounded up to the nearest 500-foot interval (500, 1000, 1500, etc). In instances of multiple products traveling through the same pipe, the product with the largest buffer distance determines the buffer distance for the analysis.

- 3.4. Overland spread analysis is applied to pipelines that could contain Non-HVL hazardous liquids.
  - 3.4.1. Potential spill volumes are calculated assuming a full line rupture with the "Shell Spill Model". The maximum flow rate during normal operations, maximum operating pressure data, location of valves and other facilities, a fifteen-minute maximum pipeline shutdown, and pipeline profile are used to calculate the maximum amount of product that will drain from the pipelines.
  - 3.4.2. Using the calculated potential spill volume, the overland spread impacts are determined based on a one-quarter inch product retention depth utilizing the shape of the land. Release locations along the pipeline shall be determined based on supporting elevation grid resolution.
  - 3.4.3. Due to the conservative methodology utilized in the overland spread modeling, no additional analysis will be completed to account for farm field tiles or ditches along side roadways.

## 3.5. Water Transport

Water-born transport of Non-HVLs and NH3 entails the location of all areas where the pipeline intersects a river, stream, or significant drainage channel. In addition, overland spread paths, upon arriving at a river or stream will initiate a water transport analysis. Peak stream velocities and response times may be used to determine the distance downstream that an HCA can be affected.

- 3.5.1. Peak stream velocities may be calculated using data obtained from the USGS.
- 3.5.2. Response times utilized to determine the extents for water transport analysis are six hours for water transport locations in populated areas and twelve hours outside populated areas. Populated areas are defined as HPAs and OPAs.
- 3.5.3. Where data is not available to determine stream velocity, a default value of ten miles is used. This value is the median of the downstream distances calculated in 3.5.1 and 3.5.2.

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- 3.6. Pipeline Facilities located in HCAs or within areas where the line pipe is identified as "could affect an HCA" are also identified as "could affect an HCA".
- 3.7. Documentation
  - 3.7.1. Records generated in the process of implementing the current segment identification shall be retained on file.

## 4. REFERENCES:

- 4.1. Regulatory -
  - 4.1.1. 49 CFR 195.452
  - 4.1.2. 16 TAC 8.101
- 4.2. Related Policies/Procedures -
  - 4.2.1. SECTION 1: Segment Identification
  - 4.2.2. Shell Spill Model
- 4.3. Forms and Attachments -
  - 4.3.1. N/A
- 4.4. Technical Reports
  - 4.4.1. "Consequences of HVL Releases," OPS/DOT-RSPA, TTO1

## 5. **DEFINITIONS**:

5.1. N/A

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## **CHANGE LOG**

		CITAIN	GE LOG
Date	Rev. #	Change Location	Brief Description of Change
08/04/06	0	Entire Document	Created Document

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Pipeline Integrity Department

## HCA Detail Assessment

Pipeline Summary

Report Criteria
Range: Beg MP: 0.00 End MP: 1,893.94
Operating Status is Active, Idle or Abandoned

PODS ID	1164	Reg. Type	Liquids Transmission
Division	DIXIE	Classification	Liquids Transmission
Owner	Dixie Pipeline Company	Status	Active
Operator	Dixie Pipeline Company	Product Type	HVL
System Name	Dixie	<b>Products</b>	Propane
Line Number	120	Mileage	1095.756

Line Name Mont Belvieu to Apex (Main Line)

Assessment ID		Beg Measure	End Measure	0 0	End Eng Station	HCA Type	F	Determination Date	HCA Comments	Mileage
	10000728 10000728	3 2219846 3 2224912	2223615	22125+15 22175+81	22162+84 22190+94	Direct ECO	Aerial Dispersion Impact on Ecological Direct Impact on Ecological Unusually Sensitive Direct Impact on Ecological Unusually Sensitive			9.422 0.714 0.287 22.432

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